

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v-

24-CR-60-LJV

GREGORY TROTTER,

Defendant.

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**GOVERNMENT'S WITNESS LIST**

THE UNITED STATES OF AMERICA, by and through its attorneys, Michael DiGiacomo, United States Attorney for the Western District of New York, Douglas A.C. Penrose and Evan K. Glaberson, Assistant United States Attorneys, of counsel, hereby submits a list of persons whom the government may call as witnesses in its case-in-chief, together with a brief summary of each witness' anticipated testimony and expected length of testimony. The witnesses are listed in the order in which the government anticipates they will testify. The government reserves its right to call witnesses not listed and will advise promptly of its intent to do so.<sup>1</sup>

1. **PHLYCIA HUNT**  
Buffalo, New York

Ms. Hunt will testify that she is a former dancer and bartender at Pharaoh's Gentlemen's Club ("PGC") and also an ex-girlfriend of Peter Gerace. Ms. Hunt will testify regarding her knowledge of drug use and distribution by Gerace and his associates and at

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<sup>1</sup> Not all listed witnesses are expected to testify at trial. Their names, however, may be mentioned by other witnesses based on their outlined involvement in the investigation. Further, counsel may enter into certain stipulations that would obviate the need for live testimony.

PGC as well as her knowledge of Gerace's connections to law enforcement officers and public officials. Ms. Hunt will testify regarding her arrest by the defendant in April 2019 for the theft of Gerace's Rolex watch. Ms. Hunt will testify regarding her subsequent cooperation with federal authorities in their investigation of Gerace and the information that she provided to federal authorities. Ms. Hunt will testify about being assaulted by Jessica Leyland, an associate of Gerace's, as a result of her cooperation with federal law enforcement.

The government anticipates that Ms. Hunt's testimony on direct examination will take approximately 1 hour.

**2. ROBERT VAN ETSEN**

Department of Homeland Security, Homeland Security Investigations

Absent a stipulation, HSI Special Agent Van Etten will testify regarding his seizure of a cellular telephone from Peter Gerace on April 27, 2019 and the subsequent delivery of that cellular telephone to HSI Special Agent Curtis Ryan.

The government anticipates that Special Agent Van Etten's testimony on direct examination will take approximately 15 minutes.

**3. CURTIS RYAN**

Department of Homeland Security, Homeland Security Investigations

HSI Special Agent Ryan will testify as one of the case agents for the investigations of Peter Gerace and former DEA Special Agent Joseph Bongiovanni and will testify about several aspects of these investigations. In particular, SA Ryan will testify about the scope of the overall investigation into Peter Gerace, including the evidence that had been gathered during the investigation as of April 2019, when Phlycia Hunt first spoke with federal law

enforcement. SA Ryan will testify regarding the information provided by Ms. Hunt in April 2019 and during subsequent proffers and how this information related to and impacted the ongoing investigation into Gerace. SA Ryan will further testify regarding certain specific aspects of the Gerace investigation, including the seizure of Gerace's cellular telephone in April 2019 and the execution of a search warrant at Gerace's house in December 2019.

The government anticipates that Special Agent Ryan's testimony on direct examination will take approximately 1.5 hours.

**4. JASON KAMMERAAD**  
Federal Bureau of Investigation

FBI Special Agent Kammeraad will testify regarding his interview of the defendant on September 30, 2022. SA Kammeraad will testify regarding the purpose of the interview and the relevance of the interview to the ongoing investigation into Gerace and Bongiovanni. SA Kammeraad will authenticate the audio recording that he made of the interview and testify about the questions that he asked during the interview and the defendant's responses to those questions, including the alleged false statements contained in the indictment in this case.

The government anticipates that SA Kammeraad's testimony on direct examination will take approximately 2 hours.

**5. AMHERST POLICE DEPARTMENT REPRESENTATIVE**  
Amherst Police Department

Absent a stipulation, the Amherst Police Department ("APD") representative will testify regarding the production of APD records in response to a grand jury subpoena that

APD received requesting records relating to the defendant and the complaint made by Gerace regarding the theft of the Rolex watch in March 2019.

The government anticipates that APD representative's testimony on direct examination will take approximately 15 minutes.

**6. JEFFREY GILBERT**

Amherst, New York

Mr. Gilbert will testify that he joined APD in 1998 and was a Detective with APD beginning around 2015 until his retirement from APD in 2021. Mr. Gilbert will testify about his relationship with the defendant during the period when they were both detectives with APD. Mr. Gilbert will testify about going to PGC for a barbecue at the defendant's suggestion in June 2018. Mr. Gilbert will also testify about the investigation into the complaint made by Gerace in March 2019 relating to theft of his Rolex watch. Mr. Gilbert will testify about his role in the investigation, the defendant's role in the investigation, and the arrest of Ms. Hunt.

The government anticipates that Mr. Gilbert's testimony on direct examination will take approximately 1 hour.

**7. VERIZON REPRESENTATIVE**

Verizon

Absent a stipulation, the Verizon representative will testify regarding the production of phone records pursuant to a grand jury subpoena that Verizon received requesting records relating to phone accounts associated with the defendant and Peter Gerace.

The government anticipates that the Verizon Representative's testimony on direct examination will take approximately 15 minutes.

**8. JAMES DONOGHUE**

Department of Homeland Security, Homeland Security Investigations

Absent a stipulation, HSI Special Agent Donoghue will testify about and authenticate a data extraction that he performed on the cellular phone seized from Peter Gerace on April 27, 2019.

The government anticipates that Special Agent Donoghue's testimony on direct examination will take approximately 30 minutes.

**9. GREGORY MACHIN**

Federal Bureau of Investigation

Analyst Machin will testify regarding his review telephone records for accounts associated with the defendant and Gerace. Analyst Machin will testify regarding his preparation of summary charts compiling and analyzing communications between the defendant and Peter Gerace based on the phone records that he reviewed.

The government anticipates that Analyst Machin's testimony on direct examination will take approximately 45 minutes.

**10. BRIAN BURNS**

Federal Bureau of Investigation

FBI Special Agent Burns will testify as one of the case agents for the investigation of Peter Gerace and former DEA Agent Joseph Bongiovanni and will testify about several aspects of these investigations. In particular, SA Burns will testify regarding the return of indictments against Bongiovanni and Gerace and the progression of the investigation subsequent to the return of first indictment against Bongiovanni in October 2019. SA Burns will testify regarding the investigation of Gerace's connections to public officials and law

enforcement officers, including the defendant, as well as the investigation into sex trafficking and drug crimes committed by Gerace. SA Burns will testify about his review of text messages between the defendant and Gerace and the purpose of the defendant's interview in September 2022.

The government anticipates that Special Agent Burns' testimony on direct examination will take approximately 1 hour.

DATED: Buffalo, New York, May 12, 2025.

Respectfully submitted,

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